

**FRIED, FRANK, HARRIS, SHRIVER
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Hearing Date and Time: September 15, 2009 @ 10:00 a.m.
Objection Deadline: September 10, 2009

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:	:	Chapter 11
	:	
LEHMAN BROTHERS HOLDINGS INC., et al.	:	Case No. 08-13555 (JMP)
	:	
Debtors.	:	(Jointly Administered)
	:	

**NOTICE OF MOTION OF A/P HOTEL, LLC FOR (I) A DETERMINATION THAT
THE AUTOMATIC STAY DOES NOT APPLY TO A NON-JUDICIAL FORECLOSURE
PROCESS BEING PURSUED BY THE DEBTORS, OR ALTERNATIVELY, (II) RELIEF
FROM THE AUTOMATIC STAY IN CONNECTION THEREWITH**

PLEASE TAKE NOTICE, that a hearing on the annexed Motion of A/P Hotel, LLC (“AP”) for (i) a determination that the automatic stay does not prevent AP from contesting a non-judicial foreclosure process Lehman Brothers Holdings Inc. (“Lehman” or “Debtor”) has recently instituted in Nevada, or, alternatively, (ii) relief from the automatic stay to permit AP to challenge that foreclosure process (the “Motion”), all as more fully described in the Motion, will be held before the Honorable James M. Peck, United States Bankruptcy Judge, at the United States Bankruptcy Court Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004 (the “Bankruptcy Court”) on September 15, 2009 at 10:00 a.m. (the “Hearing”).

PLEASE TAKE FURTHER NOTICE, that objections, if any, to the Motion must be:

(a) in writing, stating the name of the objecting party and shall state with particularity the reasons for the objection; (b) filed with the Clerk of the Bankruptcy Court, Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004 (with a courtesy copy to Judge Peck's Chambers) in accordance with the procedures in the paragraph immediately below; and (c) served upon the undersigned counsel for Movant so as to be received no later than September 10, 2009.

PLEASE TAKE FURTHER NOTICE, that objections, if any, to the relief sought in the Motion must be filed: (a) through the Bankruptcy Court's electronic filing system; or (b) if a party is unable to file electronically, such party shall submit the objection in PDF format on a diskette in an envelope with the case name, case number, type and title of document, document number of the document to which the objection refers, and the file name on the outside of the envelope; or (c) if a party is unable to file electronically or use PDF format, such party shall submit the objection on a diskette in either Word, WordPerfect, or DOS text (ASCII) format to the Clerk of the Bankruptcy Court with a label containing the information indicated in section (b) of this paragraph. An objection filed by a party with no legal representation shall comply with section (b) or (c) as set forth in this paragraph.

PLEASE TAKE FURTHER NOTICE, that the Court may grant the relief requested in the Motion without a hearing if no objections to the Motion are timely filed and served.

PLEASE TAKE FURTHER NOTICE, that the Hearing to consider the Motion may be adjourned from time to time, without further notice to the parties in interest, other than the announcement of the adjourned date or dates.

Dated: August 26, 2009
New York, New York

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